

IV. REMARKS

Claims 1-62 are pending in this application. By this amendment, claims 1-62 have been amended. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the specification is objected to for informalities related to updating information in the "Related Applications" section. In response, Applicant has amended the specification with current related application information. Accordingly, Applicant requests withdrawal of the objection.

In the Office Action, claims 1-62 are objected to for various grammatical informalities. In response, Applicant has cosmetically amended claims 1-62 to address the objection. Accordingly, Applicant requests withdrawal of the objection.

In the Office Action, claims 19, 28, 47, and 56 are rejected under 35 U.S.C. §101 and 112, first paragraph. The Examiner alleges that the claims are not supported "by either a substantial asserted utility or a well-established utility". Office Action, page 9, item 4. In response, Applicant has amended claims 19, 28, 47 and 56 with clarifications to address the rejection. In doing so, Applicant does not concede as to the correctness of the asserted standard for utility made in the Office Action by Examiner.

In the Office Action, claims 29-46, 48-55 and 57-62 are allowed. Applicant gratefully acknowledges the allowance.

In the Office Action, claims 2-8, 16, 18 and 20 are objected to but appear to be allowable if rewritten to incorporate all the limitations of the base claim and any intervening claims. In response, Applicant has amended claims 2-4, 16, 18 and 20 by merely rewriting in independent claim format. Accordingly, Applicant contends that claims 2-8, 16, 18 and 20 are now in condition for allowance and request withdrawal of the objection. Applicant respectfully contends that dependent claim 19 is also in condition for allowance because claim 19 depends from (now) independent claim 18.

In the Office Action, claims 1, 9, 12-15, 17 and 21-27 are rejected under 35 U.S.C. 102(a) as allegedly being unpatentable over IEEE paper entitled "Timing Minimization by Statistical hMetis-based Partitioning" authored by Ababei *et al.* (hereinafter "Ababei").

With respect to claim 1, Applicants submit that Ababei fails to disclose each and every feature of the claimed invention as is required under 102(a). For example, Ababei does not teach or suggest "a model input for receiving a parameterized delay model, the parameterized delay model containing a model for delay variation of *each* component of the electrical circuit", as in claim 1. (emphasis added).

Interpreting Ababei only for the purposes of this response, Applicant submits that, to the contrary, Ababei merely discloses a timing minimization by statistical timing hMetis-based partitioning. Title. There is simply no teaching, or suggestion, in Ababei of delay variation of *each* component of an electrical circuit whatsoever. In the Office Action the Examiner alleges that Ababei does have "(Parameterized) delay model utilizing pdf associated with each component (e.g., gate, wire) in the circuit under study – [Section 5]". Office Action, Page 10, item 7. A careful reading of Section 5, and Ababei in its entirety, indicates that the delay model of Ababei *only* entails two components, namely a gate delay and a wire delay. "Our delay

model has two components". See Ababei, page 3, section 5. Clearly, as in the present invention, there may be delays in components besides just gates and wires.

Accordingly, Applicant submits that there is no disclosure or suggestion in Ababei of a method that includes a step that includes a model for delay variation of each component of the electrical circuit, with respect to claim 1. Therefore, Applicant respectfully requests withdrawal of the rejection.

With respect to dependent claims 9, 12-15, 17, and 21-27, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are believed to be allowable based on the above arguments, as well as for their own additional features.

V. CONCLUSION

In light of the above remarks, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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